

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

THERESA LEININGER on behalf of herself
and all others similarly situated;

Plaintiff,

Case No.: 3:22-cv-00394-JZ

vs.

JUDGE JACK ZOUSHARY

MAMMOTH TECH, INC;

Defendant.

**MOTION FOR EXTENSION OF TIME TO FILE AMENDED REQUEST OR
SUPPLEMENTAL MATERIALS IN SUPPORT OF REQUEST FOR DAMAGES
FOLLOWING A DEFAULT JUDGMENT**

Now comes, Theresa Leininger (“Plaintiff”), by and through counsel, and respectfully moves for an extension of time to file her amended request or supplemental materials in support of a request for damages following a default judgment against Defendant Mammoth Tech, Inc. (“Defendant”) pursuant to Fed. R. Civ. P. 55. In support thereof, Plaintiff states that she needs additional time for further discussions with other judgment creditors to explore options available against Defendant, including involuntary bankruptcy, and which impacts the form of relief that will be necessary in this matter. Accordingly, Plaintiff respectfully requests an additional ten (10) days to file her amended request or supplemental materials in support of a request for damages. This request is made in good faith and not for the purpose of delay.

October 10, 2022

Respectfully submitted,

Brennan, Manna & Diamond, LLC

/s/ John N. Childs

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Attorneys for Plaintiff and the putative class

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of October, 2022, a copy of the foregoing was filed electronically. Parties may access this filing through the Court's electronic filing system.

/s/ John N. Childs

John N. Childs

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